

**IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA (Reading)**

In Re: :
LUIS MIGUEL RIVERA, : **Bankruptcy No. 25-10875-pmm**
Debtor : **Chapter 13**
Freedom Mortgage Corporation :
Movant :
 :
 :
v. :
LUIS MIGUEL RIVERA : **11 U.S.C. §362**

and
SCOTT F. WATERMAN [Chapter 13], ESQUIRE
(TRUSTEE)

Respondent(s) :

**CERTIFICATION OF NO ANSWER REGARDING FREEDOM MORTGAGE CORPORATION'S
MOTION FOR RELIEF FROM STAY (DE 23)**

The undersigned hereby certifies that, as of July 2, 2025, the undersigned has received no answer, objection or other responsive pleading to the Movant's Motion for Relief from Stay.

The undersigned further certifies that I have reviewed the Court's docket in this case and no answer, objection or other responsive pleading to the Movant's Motion for Relief from Stay. Pursuant to the Notice of Motion, objections to the Movant's Motion were to be filed and served before July 1, 2025.

It is hereby respectfully requested that the Order attached to the Motion be entered at the earliest convenience of the Court.

Dated: July 2, 2025

Respectfully submitted,

Brock & Scott, PLLC

/s/Andrew Spivack

Andrew Spivack, PA Bar No. 84439

Mario Hanyon, PA Bar No. 203993

Ryan Srik, PA Bar No. 334854

Jay Jones, PA Bar No. 86657

Attorney for Creditor

BROCK & SCOTT, PLLC

3825 Forrestgate Drive
Winston Salem, NC 27103
Telephone: (844) 856-6646
Facsimile: (704) 369-0760
E-Mail: PABKR@brockandscott.com

**IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA (Reading)**

In Re: :
LUIS MIGUEL RIVERA, : **Bankruptcy No. 25-10875-pmm**
Debtor : **Chapter 13**
Freedom Mortgage Corporation :
Movant :
 :
 :
v. :
LUIS MIGUEL RIVERA : **11 U.S.C. §362**

and
SCOTT F. WATERMAN [Chapter 13], ESQUIRE
(TRUSTEE)

Respondent(s) :

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and exact copy of the foregoing Certification of No Answer has been electronically served or mailed, postage prepaid on July 2, 2025 to the following:

LUIS MIGUEL RIVERA
1925 READING AVENUE
READING, PA 19609

MICHAEL A. CIBIK, Debtor's Attorney
1500 Walnut Street
Suite 900
Philadelphia, PA 19102
help@cibiklaw.com

SCOTT F. WATERMAN [Chapter 13], Bankruptcy Trustee
2901 St. Lawrence Ave.
Suite 100
Reading, PA 19606

Office of United States Trustee, US Trustee
Robert N.C. Nix Federal Building
900 Market Street Suite 320
Philadelphia, PA 19107

/s/Andrew Spivack
Andrew Spivack, PA Bar No. 84439
Mario Hanyon, PA Bar No. 203993

Ryan Srnik, PA Bar No. 334854

Jay Jones, PA Bar No. 86657

Attorney for Creditor

BROCK & SCOTT, PLLC

3825 Forrestgate Drive

Winston Salem, NC 27103

Telephone: (844) 856-6646

Facsimile: (704) 369-0760

E-Mail: PABKR@brockandscott.com